August 7, 1973

Mr. H. J. Holloway
GAF Corporation
P.O. Box 12
Linden, New Jersey 07036

Re: GAF Corporation Asbestos Cement Pipe Plant, St. Louis, Missouri

Dear Mr. Holloway:

This letter is in response to the compliance status information supplied by your company on OMB Form 158-R0098 relative to the National Emission Standards for Hazardous Air Pollutants (40 CFR 61) for the control of asbestos. Based on this information the following potential asbestos emission sources at your St. Louis plant have been determined to be in compliance with the reporting requirements of §61.10:

No. 1 Dry and Wet Mixer
No. 2 Dry and Wet Mixer

The following fabricating operations were not subject to the reporting requirements of §61.10, and, therefore, were not evaluated for compliance:

No. 1 Saw
No. 2 Saw
No. 3 Saw
Miter Saw
Scrap Grinding

If you have any questions regarding this matter, please contact Mr. Robert T. Jacobs, Jr., by letter or by telephone at 816-374-2576.

Very truly yours,

ORIGINAL SIGNED BY
ROBERT L. MARKEY

Robert L. Markey
Director
Division of Enforcement

bcc: Director, Division of Stationary Source Enforcement
Mr. Michael J. Sanderson

ENFC-COMP:DHPrah:wt, 1735 Baltimore, Room 204, X2576, 8-7-73

CONCURRENCES

SYMBOL	ENFC-COMP							
SURNAME	PRAH/PRY							
DATE	8/7/73	8/7/73	8 Aug 73					

EPA FORM 1320-1

07KF

30290609

4.2

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Evaluation of NESHAPS Compliance Status Report for the Asbestos Cement Pipe Manufacturing Plant of GAF Corporation, St. Louis, Missouri

DATE: July 26, 1973

FROM: Delmar H. Prah, Sanitary Engineer, Air Compliance Section

THROUGH: Robert T. Jacobs, Jr., Acting Head, Air Compliance Section

TO: Files

1. Source Reporting and Waiver Request, §61.10

a. Information required under §61.10(a) is sufficient for a determination of compliance with the asbestos standard for the following sources at this plant:

(1) Dry and wet mix #1

(2) Dry and wet mix #7

b. Information was also supplied for the following fabricating operations, not subject to the reporting requirements of the regulations at 40 CFR 61.10:

(1) Sawing - #1 Saw

(2) Sawing - #2 Saw

(3) Sawing - #3 Saw

(4) Sawing - Miter Saw

(5) Scrap Grinding

c. No waiver of compliance is requested. The company indicates it is in compliance as of the effective date of the regulations.

2. Conditions of Approval

a. No source test will be required of this source to demonstrate compliance by the visible emission prohibition of §61.22(c).

3. Recommend:

Approval

cc: Mr. Michael J. Sanderson

NATIONAL EMISSION . RDS FOR HAZARDOUS AIR POLLUTAN
COMPLIANCE STATUS INFORMATION

FORM APPROVED
OMB NO. 158-R0098

I. SOURCE REPORT

INSTRUCTIONS: Owners or operators of source of hazardous pollutants subject to the National Emission Standards for Hazardous Air Pollutants are required to submit the information contained in Section I to the appropriate U.S. Environmental Protection Agency Regional Office before July 6, 1973.

A listing of regional offices is provided in § 61.04.

EPA USE ONLY

1 R S C SC 13

19 AQCR RP CITY 28 NDC 80

A. SOURCE INFORMATION

1. Identification/Location - Indicate the name and address of each source.

GAF CORPORATION
A29 COMPANY NAME A48

9215 RIVERVIEW DRIVE
A49 NUMBER STREET NAME A68

ST LOUIS MO 63137
B19 CITY B33 STATE B34 ZIP CODE B38

COUNTY

2. Contact - Indicate the name and telephone number of the owner or operator or other responsible official whom EPA may contact concerning this report.

H.J.HOLLOWAY
B39 NAME B53

2018622600
B54 TELEPHONE B63

3. Source Description - Briefly state the nature of the source (e.g., "chlor-alkali Plant," or "Machine Shop").

ASBESTOS CEMENT PRODUCTS PLANT
C19 C43

4. Alternative Mailing Address - Indicate an alternative mailing address if correspondence is to be directed to a location different than that specified above.

P.O.BOX 12
C44 NUMBER STREET NAME C63

LINDEN NJ 07036
C64 CITY C77 C78 STATE C79 D75 ZIP CODE D79

5. Compliance Status - The emissions from this source [XX] can [ ] cannot meet the emission limitations contained in the National Emission Standards on or before July 5, 1973. L. J. Faneuf, Dir. of Manufacturing, Building Products Div.

June 29, 1973

Lou Faneuf
SIGNATURE OF OWNER, OPERATOR OR OTHER RESPONSIBLE OFFICIAL

NOTE: If the emissions from the source will exceed those limits set by the National Emission Standards for Hazardous Air Pollutants, the source will be in violation and subject to Federal enforcement actions unless granted a waiver of compliance by the Administrator of the U.S. Environmental Protection Agency. The information needed for such waivers is listed in Section II of this form.

I. B. PROCESS INFORMATION. B should be completed separately for each point of emission for each hazardous pollutant. (1 of 7)

EPA USE ONLY

G14 EF G15 G4t SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

D R Y M I X A N D W E T M I X # 1 (G21 – G45)

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

A B (G19 – G20)

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

3 6 7 0 0 0 (G54 – G60)

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

B A G H O U S E (H19 – H34) PRIMARY CONTROL DEVICE TYPE

H51 9 9 . 9 H53 PERCENT REMOVAL EFFICIENCY

(H35 – H50) SECONDARY CONTROL DEVICE TYPE

H54 . H56 PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 15 ÷ 20 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = 2 inches w.g.

. If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

. If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

. Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC (H57)

I. B. PROCESS INFORMATION. B should be completed separately for each point of emission for each hazardous pollutant. (2 of 7)

EPA USE ONLY

G14 EF G15 G40 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

DRY MIX AND WET MIX #7

G21 G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

AB

G19 G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

49800

G54 G60

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

BAG HOUSE

H19 PRIMARY CONTROL DEVICE TYPE H34

H51 99.9 H53

PERCENT REMOVAL EFFICIENCY

H35 SECONDARY CONTROL DEVICE TYPE H50

H54 . H56

PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 15 - 20 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = 2 inches w.g.

. If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

. If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

. Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC H57

I. B. PROCESS INFORMATION. B should be completed separately for each point of emission for each hazardous pollutant. (3 of 7)

EPA USE ONLY

G14 EP G15 G40 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

G21 SAWING-#1 SAW G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

G19 AB G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

G54 1300 G60

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

H19 BAG HOUSE H34
PRIMARY CONTROL DEVICE TYPE

H51 99.9 H53
PERCENT REMOVAL EFFICIENCY

H35 H50
SECONDARY CONTROL DEVICE TYPE

H54 . H56
PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 20 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = .7 inches w.g.

. If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

. If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

. Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC H57

I. B. PROCESS INFORMATION. B should be completed separately for each point of emission for each hazardous pollutant. (4 of 7)

EPA USE ONLY

G14 EF G15 G46 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

S A W I N G - # 2 S A W (G21 – G45)

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

A B (G19 – G20)

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

1 3 0 0 0 (G54 – G60)

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

B A G H O U S E (H19 – H34) PRIMARY CONTROL DEVICE TYPE

H51 9 9 . 9 H53 PERCENT REMOVAL EFFICIENCY

(H35 – H50) SECONDARY CONTROL DEVICE TYPE

H54 . H56 PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 20 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = .7 inches w.g.

. If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

. If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

. Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC (H57)

I. B. PROCESS INFORMATION. B should be completed separately for each point of emission for each hazardous pollutant. (5 of 7)

EPA USE ONLY

G14 EF G15 G46 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

G21 S A W I N G - #3 S A W G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

G19 A B G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

G54 1 3 0 0 0 G60

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

H19 B A G H O U S E H34
PRIMARY CONTROL DEVICE TYPE

H51 9 9 . 9 H53
PERCENT REMOVAL EFFICIENCY

H35 SECONDARY CONTROL DEVICE TYPE H50

H54 . H56
PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 20 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = .7 inches w.g.

. If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

. If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

. Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC H57

I. B. PROCESS INFORMATION — B should be completed separately for each point of emission for each hazardous pollutant. (6 of 7)

EPA USE ONLY

G14 EP G15 G40 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

G21 SAWING-MITER SAW G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

G19 AB G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

G54 200 G60

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

H19 BAG HOUSE H34 — PRIMARY CONTROL DEVICE TYPE

H51 99.9 H53 — PERCENT REMOVAL EFFICIENCY

H35 — H50 — SECONDARY CONTROL DEVICE TYPE

H54 . H56 — PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 20 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = .7 inches w.g.

. If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

. If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

. Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC H57

B. PROCESS INFORMATION - should be completed separately for each point of emission for each hazardous pollutant. (7 of 7)

EPA USE ONLY

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

SCRAP GRINDING (G21 – G45)

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

AB (G19 – G20)

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

775 00 (G54 – G60)

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

BAG HOUSE (H19 – H34) PRIMARY CONTROL DEVICE TYPE

99.9 (H51 – H53) PERCENT REMOVAL EFFICIENCY

(H35 – H50) SECONDARY CONTROL DEVICE TYPE

(H54 – H56) PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 15 - 20 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = 2 inches w.g.

. If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

. If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

. Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC (H57)